

From: [Brian Renninger](#)
To: ["Brandon Byhre"](#)
Subject: Furnace Resizing Project
Attachments: [50-181.pdf](#)
[50-125P.pdf](#)
[50-150 Environmental Checklist.pdf](#)

Mr. Byhre,

The agency has determined that your proposed furnace resizing does not qualify for a b(10) exemption. Agency interpretation is to consider the resized furnace as a new emission unit based on the changes in size and structural modifications shown in the drawing presented in your application. Please provide the following information to complete your application.

1. An emission inventory quantifying the emissions of the new furnace. This inventory should include emissions from fuel combustion, particulate from the furnace during operation, and a quantification of toxic and hazardous air pollutant emissions under worst case glass formulas.
2. A Best Available Control Technology (BACT) analysis following top-down methods.
3. A dispersion modeling analysis quantifying ambient concentrations of toxic air contaminants resulting from emissions from the furnace (under worst-case emitting glass formulas).
4. An analysis as to the applicability of the New Source Performance Standard (NSPS) Subpart CC. The analysis should discuss whether this unit should be interpreted as "all-electric" under the NSPS and whether this project qualifies as "reconstruction" under the NSPS definition (40 CFR 60.15). Note that under 40 CFR 60.292(c) costs of rebricking should not be counted towards determination of "reconstruction". That is per 40 CFR 60.291 "rebricking" includes "...replacement of the refractories comprising the bottom, sidewalls, or roof of the melting vessel; replacement of refractory work in the heat exchanger; replacement of refractory portions of the glass conditioning and distribution system."
5. An analysis of whether the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Area Sources: Glass Manufacturing (Subpart SSSSSS) applies to your facility and if so, whether this furnace is an affected unit under the NESHAP.
6. A SEPA Environmental Checklist.

Please, note that at this time no decisions have been made in regards to appropriate BACT or NSPS and NESHAP applicability. The purpose of the application and the above information is to determine Spectrum Glass's interpretation of their status in regards to this project and also to identify the pertinent information for the agency to come to a conclusion regarding these questions. I have also attached some application forms for your use. Most of the above questions will need to be answered as attachments to the attached forms.

Please feel free to contact me in regards to your application if you have questions.

Sincerely,

Brian Renninger

Engineer
Puget Sound Clean Air Agency

206.689.4077

brianr@pscleanair.org
1904 Third Avenue, Suite 105
Seattle, WA 98101

"Working together for clean air"
www.pscleanair.org